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VIA FACSIMILE
May 25, 2004

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Charles Gautier, Bureau Chief
Bureau of Comprehensive Planning
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

Re: Leon County Comments and Suggested Revisions to Settlement Language
for *DCA, et al, v. Wakulla County, et al*, Case No. 03-4516 GM

Mr. Gautier:

Thank you for the continuing opportunities to meet with you, your staff, and representatives of all the parties involved in the above-styled litigation to discuss settlement language and revisions thereto. As discussed at our last meeting on May 4, 2004, Leon County hereby submits its proposed revisions to the settlement proposal dated April 28, 2004, which was the basis for discussion of settlement at that meeting. As we stated at the meeting, we commend the Department and the applicant for the progress made toward correcting deficiencies in the plan amendment, such as natural resource concerns, lack of a demonstration of need and promoting urban sprawl issues. However, we are disappointed that the Department is considering accepting a settlement proposal which would not require a demonstration of adequate public facilities available to serve the development authorized by the amendment. We consider this a departure from the Department's standard practice, as well as a departure from its enforcement of the Growth Management Act, Rule 9J-5, and in this case, the Department's specific findings in its Statement of Intent issued on November 26, 2003.

The enclosed revised settlement draft (staff revisions are in **bold and underlined**), concentrates on addressing Issue III raised in the Department's Statement of Intent – Lack of Adequate Public Infrastructure – specifically as it relates to roadway impacts and traffic concurrency. The County's revisions tie the requirement for adequate public facilities and services to all three phases of development allowed in the amendment, requires maintenance of internal vehicular capture rates prior to authorizing the next phase of development (and reduces the required capture rate in exchange for provision of a comprehensive interconnected bicycle and pedestrian ways), and reintroduces the concept of an

Charles Gautier, Bureau Chief
Bureau of Comprehensive Planning
Page 2
May 25, 2004

Attachment # 2
Page 2 of 16

interlocal agreement Leon and Wakulla Counties to address the anticipated traffic impacts from the allowable development. We hope that these specific language changes are helpful to you and your staff in crafting your final settlement proposal, anticipated on June 8, 2004.

As you are probably aware, I will be out of the country from May 27 through June 11, 2004. If you have questions regarding our changes, please contact me or, in my absence, David McDevitt, Director of Development Services at 488-9300.

Sincerely,



Suzanne Van Wyk
Assistant County Attorney

SVW:sl

Enclosure

cc: Susan Poplin, Senior Planner
Timothy Dennis, Esq.
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05/25/04

LEON COUNTY REVISIONS TO SETTLEMENT PROPOSAL
BOLD AND UNDERLINE**1.2.9 Sustainable Community**

(1) Description - This mixed use designation promotes the creation of self-contained new communities in unincorporated Wakulla County. The designation provides for an integrated mix of land uses which address the social, environmental, economic, and infrastructure needs of the county into the next century. Distinguishable features of a Sustainable Community may include pedestrian and bicycle trails; public transit and alternative transportation modes; public open spaces; nature parks, conservation areas, environmental preserves and greenway linkages; facilities for public and higher education; police and fire protection services; building energy efficiency; crime prevention through environmental design (CPTED); affordable housing; and commercial and light industrial areas located in proximity to residential areas. The designation of Sustainable Community shall be applied by Wakulla County to further eight ~~six~~ broad principles of sustainability;

- Restoring key ecosystems;
- Achieving a more clean, healthy environment;
- Limiting urban sprawl;
- Protecting wildlife and natural areas;
- Protecting natural groundwater resources and aquifer recharge areas
- Advancing the efficient use of land and other resources;
- Creating quality communities and jobs;
- Minimizing external traffic impacts and maximizing internal capture rates.

A Sustainable Community is a development that will not customarily be built-out within less than a ten (10) year planning time frame. During this period, long-term sustainable development patterns will be promoted, as outlined in best Development Practices (DCA, March 1997) and Pedestrian and Transit Friendly Designs (FDOT March 1996 as updated).

(2) Permitted/Prohibited Uses

(a) This is a mixed use designation in which suburban or exurban residential is the predominant use. Various types of residential and non-residential uses may be permitted at intensities consistent with the community character and the natural environment. Heavy industrial use and similarly incompatible uses shall be prohibited. This mixed-use designation is generally appropriate in areas where there are crossroads with good access near which development should be concentrated, such as in the county's Enterprise Zones and urban service areas, where central sewer and water exist.

(b) Agricultural and forestry activities which produce odors or rely on unrestricted applications of pesticides or other similar materials shall be limited in proximity to residential areas.

(c) Public land uses, including schools, may be permitted within this land use designation subject to staff review, public hearing, and approval process if compatible and consistent with the land use designation and established as a Conditional Use in the Wakulla County Land Development Code.

(3) Density/Intensity Limitations

(a) Residential development outside the coastal high hazard area may be permitted at a density of 10 dwelling units per acre.

~~(b) Sustainable Community designations shall only be applied to areas of sufficient size to ensure that meaningful scale and mixture of use is achieved. In areas outside the coastal high hazard area, residential development may be permitted at a maximum allocated density of 10 dwelling units per acre, but the total developable residential land excluding open space shall not exceed 75 percent of the overall land area.~~

(b) ~~(b)~~ Within the coastal high-hazard area, residential development shall be permitted at densities not to exceed four (4) units per acre in areas where central water and sewer (including package plants) are available.

(c) ~~(e)~~ Non-residential development shall be allowed at a maximum floor-area ratio (FAR) of 0.5 where central water and sewer are available ~~and 60% or more of the gross area of the land use has been set aside in public open space.~~

(d) ~~(d)~~ The category shall establish the following percentage distribution of mix of uses for the Sustainable Community category including the following:

Land Use Category	Density/Intensity	Distribution of Mix Min. – Maximum %
Residential	10 du/acre*	<u>40%-48%</u> 5%-30%
Commercial (Retail/Office)	.5 FAR**	7%-12%
Industrial	.5 FAR	<u>0-15%</u> 10%
Open Space**	N/A	<u>Min of 45%</u> 60%
<p>*Except within Coastal High Hazard Areas **Except as specified in part c above **Open Space: Within the Sustainable Community land use category, open space is intended to consist of naturally vegetated areas, and natural resource features such as wetlands, streams, habitats and karst features. Passive uses including nature trails, bike/pedestrian trails, habitat observation areas shall be allowed. Residential and non-residential development shall be prohibited with the exception of structures for the caretaking and for management and maintenance of the areas.</p>		

(e) ~~(e)~~ All Developments within the Sustainable ~~Development~~ Community Category shall ensure that the ratio of non-residential development providing job potential is

approximately 1.5 ~~1.3~~ jobs to 1 residential unit calculated based on the assumptions that commercial results in approximately 1 job per 500 square feet, office results in approximately 1 job per 200 square feet and the average household size is approximately 2.5778; with a ~~desired target of 1:1~~ and an acceptable range of 1.03 – 1.7 to 1. The housing provided should include opportunities for a range of units affordable based on income wages earned associated with the provided non-residential uses.

(4) Special Development Standards

- (a) Properties in the Sustainable Community designation may only be developed or redeveloped after being rezoned to Planned Unit Development (PUD). The Land Use Plan for each PUD within the community shall identify all land uses, infrastructure, open space, recreational and common areas, phasing, alternate transportation modes, and environmental features and constraints. Land Development Regulations shall be amended to address native plant species utilization and requirements for identification and consideration of specific site characteristics.
- (b) Concurrency exceptions or alternative LOS measures to areas in the Sustainable Community may be permitted through the use of techniques consistent with Florida Statute 163.
- (c) Non-residential land uses may be permitted if the proposed use is not harmful to or inconsistent with the principles of sustainability set forth in Policy 1.2.9(1). ~~sustainable land-use purposes.~~
- (d) Non-residential development should be clustered to provide open spaces and buffers and shall be subject to review and approval pursuant to the review procedures identified in the Land Development Code.
- (e) Non-residential development of structures over five thousand (5,000) gross square feet in area shall meet fire flow concurrency pursuant to the County Land Development Code.
- (f) Commercial uses located along principal arteries shall be set back sufficiently to accommodate future right-of-way as identified in the Traffic Circulation Element and buffer zones as specified by the land development code.
- (g) Significant environmental areas such as wetlands and species habitat shall be conserved in their natural state. These areas may be deeded to non-profit organizations for preservation and conservation, ownership may be public, or made subject to deed restrictions. Where alteration cannot be avoided ~~is necessary~~, appropriate mitigation will be required.
- (h) Where areas exist which are habitat for threatened or endangered species, contain isolated wetlands, or where lands are set aside as open spaces, the density of residential use shall be maintained, as addressed by transfer of development rights in the Land Development Code. Open space shall be planned to maximize connectivity among habitats, to maintain separations between urban and suburban areas and rural areas, to minimize sprawl and to connect other open space, park or greenway corridors. Open space networks shall be identified and mapped.
- (i) Preference should be given to preservation of quality native vegetation as landscaping in non-residential areas, rather than clearing and replanting.

- (j) Native trees must be conserved in accordance with the designation and criteria in the Land Development Code.
- (k) The construction of all buildings should be in compliance with the Florida Energy Efficiency Code and each developer must conference with Wakulla County's staff to discuss energy consumption reduction.
- (l) Development within the Sustainable Community land use category shall be supported by a needs analysis on a County-wide basis that assesses the current and future land use needs for both residential and non-residential uses.
- (m) All Developments within the Sustainable Community land use category shall demonstrate that consider development that cumulative impacts of development result in no net increase in nutrient loading for nitrates and seek to achieve a no net increase in nitrate loading to groundwater sources, particularly if located within the Wakulla Springs Contribution Area as defined in exhibit ___. Each development shall include a Stormwater Management Plan with special provisions where necessary to address ~~common features within the County~~ including high aquifer recharge areas, karstal areas and sink holes.
- (n) All Developments within the Sustainable Community category shall participate in the Transit/TDM plan required by Transportation Policy (TCE) 1.5., and shall be designed to result in a minimum internal capture rate of 15% for trips. Each Sustainable Community shall make provisions for implementing TDM measures. ~~They~~ The TDM measures shall include but not be limited to the provision of on-site park and ride facilities, implementation of measures identified in the County TDM plan when developed, and incorporation of pedestrian and transit friendly design consideration.
- (o) Each Sustainable Community shall be designed to incorporate an overall pedestrian/bikeway network which links open space, residential and non-residential development within the sustainable community as well as connecting to other open space, bike and pedestrian facilities off-site when feasible.
- (p) The County shall require all sustainable developments to ~~consider~~ reduce water usage ~~reduction~~ by implementing water conservation measures and requiring water flow reduction devices.
- (q) A Landscape Management Plan ~~should~~ shall be required as a pre-requisite for approval of Planned Unit Developments within the Sustainable Community Designation. The landscape management plan ~~should~~ shall minimize use of managed turf, require pre-dominate use of native vegetation, minimize the need for irrigation, fertilization, and chemical applications, and provide for property owner education, implementation and enforcement.
- (r) All developments within the Sustainable Community category shall be phased and monitored to ensure compliance with the adopted roadway levels of service as implemented through the Wakulla County concurrency management process.

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1.2.9.1 Northeast Wakulla County Sustainable Community

The 606+/- acres designated as Sustainable Community by Ordinance No. 2003-23 shall be subject to the following limitations and standards:

(a). The Northeast Wakulla County Sustainable Community shall be master planned to facilitate a community design at build-out that provides for and encourages the internalization of vehicular traffic, provides for a comprehensive system of pedestrian and bicycle ways, and interconnected undisturbed open space areas. The Sustainable Community shall be limited to the following development phases and thresholds based on the availability of sufficient public facilities and services at the locally adopted levels of service pending completion of a needs analysis and demonstration of achievement of the following employment generation based on the recommended jobs to housing ratio of 1.3 :1 balance as specified below:

Build-out of the proposed Northeast Wakulla County Sustainable Community shall include the following development types and thresholds.

650 150 single-family units;
150 40 multi-family units;
350,000 97,500 square feet of retail/commercial space; and
100,000 200,000 square feet of office space.

~~An additional 90 single-family and 60 multi-family units shall be allowed subsequent to completion of the commercial land uses and half of the allowed office space.~~

1. The first phase An initial level of development shall be allowed up to:

300 single-family units;
50 multi-family units;
157,500 square feet of retail/commercial; and
42,000 square feet of office

2. Subsequent to the build-out of the first phase as outlined above, a An additional 100 single-family units (for a total of 400 single-family units) , 45,000 square feet of retail/commercial and 12,000 square feet of office shall be allowed subsequent to completion of the commercial land uses and half of the allowed office space;

No further residential development may occur in the Sustainable Development until the above demonstration by the owner to the County that sufficient public facilities and services at the locally adopted levels of service is available, and that the following criteria have been met:

a) Retail/commercial development in the amount of 157,000 sf and office development in the amount of 42,000 sf the specified level of retail/commercial

and office development have been completed and occupied, and the data demonstrate that 150 jobs in the commercial/retail sector and 250 jobs in the office sector have been created. New jobs from D development created in Opportunity Park may be applied to this requirement but cannot count towards more than the equivalent of 20,000 sf of office or 71,000 sf of retail/commercial (45% of the required levels of the non-residential development.) Future residential development above this level shall be subject to a plan amendment wherein the amendment assesses: 1) Natural resources including groundwater wherein the amendment determines potential impacts from nutrient loading and demonstrates

b) Based on a nitrate loading study, performed by a licensed professional using professionally acceptable methodology and approved by the Northwest Florida Water Management District and the Florida Department of Environmental Protection, the cumulative development including the additional 100 units will result in no net increase in nutrient loading to groundwater.

c) ~~2) Facilities and Services where the amendment determines if sufficient public facilities and services are available based on at the locally adopted level of service. For transportation, demonstration of participation in the Wakulla County TDM program. The owners shall demonstrate to the County that the first phase of the development is maintaining as established and a minimum of 15% internal vehicular trip capture during the pm peak hour for new trips associated with the mix of land uses proposed. development tfor the development is also required. + and 3) The provision of a comprehensive system of interconnected pedestrian and bicycle ways shall reduce the required internal vehicular trip capture rate to 10%. provide 5% credit toward the Jobs/Housing mix wherein the amendment determines if jobs are provided at an acceptable ratio and that the housing products provide affordable opportunities as expressed above.~~

3. Development up to the maximum stated in 1.2.9.1.(a) but not exceeding 650 single-family units, 150 multi-family units, 350,000 sf of retail and 100,000 sf of office shall be allowed subsequent to the demonstration of the following:

a) Retail/commercial sf of 200,000 and Office sf of 54,000 have been completed wherein Opportunity Park may contribute up to 50% (27,000 sf of office or 100,000 sf of retail/commercial);

b) Based on a nitrate loading study, performed by a licensed professional using professionally acceptable methodology and approved by the Northwest Florida Water Management District and the Florida Department of Environmental Protection, development at the level specified in 1.2.9.1.(a) will result in no net increase in nutrient loading to groundwater. The study can take into account specific on-site activities or compensatory reduction off-site through the expansion of AWT service;

c) Sufficient public facilities and services are provided at the adopted level of service including identification and scheduling of any needed roadway improvements to address deficiencies in the SR 363 (Woodville Highway) Corridor in both Leon and Wakulla County. Demonstration of participation in the Wakulla County TDM program as established and a minimum of 15% internal vehicular trip capture for the development is also **maintained required**.

d) Completion of the County needs analysis required in Policy 1.2.11.

(b) A school site of not less than 40 acres shall be provided.

- (c) Sewage treatment facilities to serve this site shall be designed and constructed to Advanced Wastewater Treatment standards, including water re-use;

1. Prior to any development, the wastewater treatment facility and associated spray field shall be upgraded to provide 600,000 ~~2-million~~ gallons per day of advanced wastewater treatment capacity. All development within this "Sustainable Community" shall be served by the central wastewater treatment facility at a treatment level of advanced wastewater treatment. At no time will development within the "Sustainable Community" be served by on-site systems or at a treatment level less than advanced wastewater treatment.
2. No rapid infiltration basins shall be utilized for effluent disposal.
3. At the time the on-site wastewater infrastructure is constructed the water reuse infrastructure (defined as all piping necessary to serve the residential and non-residential development of the Sustainable Community with recycled water from the AWT plant) shall also be constructed. Development within the Sustainable Community will be required to implement water re-use ~~as appropriate~~. All common areas which require watering shall incorporate water reuse

- (d) (e) Stormwater measures shall include the following:

1. Specific facilities:

- a. Roadside swales shall be required in lieu of curb and gutter for all streets excluding SR 363 (Woodville Highway) and Commerce Boulevard. ~~arterials and collectors~~
- b. Rooftop drainage shall be directed to vegetated areas and swales, and away from impervious surfaces.
- c. Commercial and office land uses within the Sustainable Community shall utilize pervious pavement for parking lots and be maintained appropriately.
- d. A Stormwater Management Plan shall be required, and must be in accordance with the karst criteria of the St. Johns River Water Management District. As part of the required Stormwater Management Plan, a hydrologic balance analysis must be provided to demonstrate that post-development stormwater impacts will not exceed pre-development stormwater impacts. Post development stormwater quality and quantity must equal pre-development stormwater quality and quantity. ~~Use of roadside curbs and gutters shall be discouraged, and grassed roadside swales required where safety considerations allow. Sidewalks where appropriate shall be only on one side of the street.~~
- e. Integrated pest management and best management practices for fertilization shall be followed and mechanisms for enforcement of the practices shall be developed and implemented.

~~(e) (f)~~ The County shall require installation of a A minimum of four groundwater monitoring wells shall be established to document groundwater trends and impacts, and to ensure that best management practices being used are protecting groundwater resources. ~~(There are existing wells on the parcel which could possibly perform this function.)~~ Two wells should be upgradient and two wells down gradient. Prior to any on-site development activities (including grading and movement of soils) the developer shall gather samples to establish pre-development (background) water quality conditions. Sampling will be performed semi-annually and the results provided to the NFWMD, DEP and DCA within 30 days of sampling. Sampling parameters shall include but not be limited to nitrogen and phosphorus series and total suspended solids. If the monitoring indicates a degradation in water quality based on the established statistical criteria as directed by NFWMD and DEP, no further development ~~beyond that initially approved in part 1.2.9.1(a)~~ shall be permitted until the developer can demonstrate that corrective actions will be implemented that alleviate nutrient loading issues.

~~(f) (g)~~ Open Space: The Sustainable Community shall maintain a minimum of 45 60% of the gross land area as common open space. Such open space shall be designated on the recorded plat. The primary purposes of open space include permanent protection of land so that it will function naturally for recharge, reduction of e maintained landscape surface area and reduce nutrient inputs and water withdrawals from the aquifer and provide wildlife habitat. The open space shall include any karst features on-site. The open space shall maintain linkages, where possible, and in consideration of information provided in the NFWMD watershed management priorities and the FNAI Integrated Habitat Rankings.

~~(g) (h)~~ Covenants and restrictions and site plan provisions shall include the following:

1. Parcel Coverage:

- i. for both residential, the development shall require that 50% of the gross acreage of the individual parcel (square footage) be left (or planted) in predevelopment native vegetation; and
- ii. for non-residential, the development shall require that 50% 35% of the gross acreage of the individual parcel parcel-size (square footage) be left (or planted) in pre-development native vegetation.

2. Clearing: To ensure the protection of existing native vegetation, development standards ~~will~~ shall require that only the footprint of development and a ten (10) five (5) foot buffer will be cleared during the site preparation and construction stage. Areas of native vegetation must be "flagged" for protection from vehicles and machinery and the upmost due care shall be taken to protect native vegetation growing on site.

3. BMPs: ~~Covenants and restrictions and site plan provisions for both r~~Residential and non-residential development shall require best management practices as dictated by the principles and practices of the Florida Yards and Neighborhoods Program. Material on the Florida Yards and Neighborhoods Program shall be given to landowners/developers by the county prior to commencing any on site activities. An

annual Florida Yards and Neighborhoods Program Education Workshop shall be conducted by the county within the Sustainable Community to increase awareness of the potential groundwater impacts from landscape and turfgrass maintenance practices.

- (h) ~~(g)~~ Parks, preserves and open space shall be managed where soils permit for maintenance and creation of historic Wakulla Sand Hills habitat.
- (i) ~~(h)~~ The County shall address inter-county impacts attributable to the Sustainable Community project along the Woodville Highway Corridor through participation in local coordinative programs.
- (j) ~~(i)~~ The County shall implement the following transportation measures associated with the limit development within the Sustainable Community development as identified to the level as indicated in Policy 1.2.9.a. Activities shall include but are not limited to:
 - i. Participation in the Leon County MPO and MPO Planning Process for development of a Long Range Transportation Plan (LRTP) to address issues within the Woodville Highway Corridor including potential improvements and non-automotive transportation opportunities.
 - ii. Coordination by December 31, 2004, with the MPO and FDOT to conduct an analysis of the Woodville Highway corridor to determine what short-term and long-term improvements will be needed to maintain adopted level of service including consideration of development of additional inter-county links.
 - iii. Revising the comprehensive plan to include a revised projected future traffic circulation map and other revisions as applicable to implement the County's transportation concurrency management system.
 - iv. Participation in the Transit/TDM Program as established by Transportation Policy 1.5.
 - v. By January 2005 the County shall develop and implement an inter-local agreement with Leon County that addresses the anticipated traffic impacts on the Woodville Highway (SR 363 corridor) from the Sustainable Community development as identified Policy 1.2.9.a

Transportation Policies

Policy 1.5: The County shall establish a Transit/Transportation Demand Management (TDM) program by January 2005. The proposed Transit/TDM program shall, at a minimum will consider the following:

- i. Parking management provisions including parking areas and preferential parking for vanpooling purposes.

- ii. Transit and current ridesharing information shall be displayed in all public gathering areas, in employment centers and in commercial areas.
- iii. Work hour adjustments such as: 1) compressed work weeks; 2) staggered work housing involving shift is the work hours or employees and 3) flexible work hours involving individually determined work hours within guidelines established by the employer.
- iv. Facilitate increase in non-automotive transit services and consider implementing shuttle service
- v. Establishment of a program to help coordinate ride sharing, transit information and use, flex time, telecommuting, and traffic condition reporting.
- vi. The County shall actively promote the use of non-automotive transit service through fare discounts as applicable.
- vii. The County shall require that dedicated easements and improved pathways are considered for use by bicyclists and pedestrians in all development plans in the sustainable community land use category;
- viii. Identify methods to implement the TDM program.

The TDM program and an annual update shall be submitted to the Leon County MPO within 30 days of completion.

Policy 1.6: By January 2006, the County shall complete a transportation analysis and scheduling of appropriate short-term and long-term transportation improvements that address identified deficiencies associated with the build-out of the proposed Northeast Wakulla County Sustainable Community in the Wakulla County and the applicable components of the Leon and Leon-County roadway network. No additional future land use map amendments shall be adopted within the SR 363 Corridor within Wakulla County until the analysis and scheduling is complete.

Conservation Policy 5.7

Policy 5.7: By January 1, 2005, the County shall transmit an update to the Conservation Element that addresses enhancements to groundwater and sinkhole protection including but not limited to the Wakulla Springs contribution area, high aquifer recharge areas, and karst areas.

Future Land Use Policy

Policy 1.2.11: By June 30, 2005, the County shall prepare and complete a land use needs analysis including residential and non-residential land uses. by December 31, 2004. The analysis shall include the following basic steps: 1) Assess where you are in terms of population including updating current population and projecting population through your intended timeframe; 2) Assess your existing land uses and vacant lands by land use category identifying how much is developed and how much is left including extent, character and location; 3) Identify demand for land uses by category through the planning timeframe using what you know about the population, household characteristics and employment; and 4) Compare identified demand to available vacant lands to determine if additional lands should be designated with certain uses and to determine if surpluses exist in allocated lands. Basic data needs in most cases include data on existing land use as specific and accurate as possible, vacant lands, population data and projections, average household size and employment data. Beyond the data, the analysis should include appropriate assumptions for household size, acceptable multiplier or capacity limit, and market factors supported by local data as appropriate. All future land use map changes shall provide a land use needs analysis as data and analysis. conduct an analysis as referenced.